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REMARKS

Claims 1-33 are currently pending in the subject application and are presently under consideration. A clean version of all pending claims is found at pages 2-7 of this Reply. No claims have been amended herein.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments herein *infra*.

I. Rejection of Claims 1-33 Under 35 U.S.C. §103(a)

Claims 1-33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Potter *et al.* (US 6,157,393) in view of Aranda (US 5,321,809). This rejection should be withdrawn for at least the following reasons. Neither Potter *et al.* nor Aranda, alone or in combination, teach or suggest every limitation set forth in the subject claims.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) *must teach or suggest all the claim limitations*. See MPEP §706.02(j). The *teaching or suggestion to make the claimed combination* and the reasonable expectation of success *must both be found in the prior art and not based on applicant's disclosure*. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) (emphasis added).

The present invention relates generally to the field of video displays and more particularly to an improved raster engine with a multiple color depth digital display interface. Independent claim 1 recites "A *raster engine for interfacing a frame buffer* in a computer system to *one of a plurality of disparate displays*, comprising: at least one *control register programmable* via the computer system *to select a display mode*;" Independent claims 20, 26, and 30 recite similar language. "Disparate" is defined as

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"markedly distinct in quality or character." The raster engine of the subject claims "is easily programmed to interface a computer system running a variety of application programs with a plurality of disparate display types." The invention can thus be employed in high end as well as highly cost sensitive computer system applications in association with displays ranging from high definition television (HDTV) to low resolution monochrome EL and/or LCD display panels." (Page 4, lines 26-31.) The raster engine of the subject claims is capable of *selecting a display mode*. (See, e.g., Claims 1, 21, 26, and 30.) "In addition, the raster engine can further comprise an integrated digital to analog converter (DAC) to support analog LCD displays and CRTs." (Page 9, lines 13-14.) Furthermore, "[p]rogrammable compare and register logic 4 allows a user or a host system application program to select appropriate display modes for interfacing a frame buffer with one or a plurality of disparate display devices." (Page 16, lines 23-25) Thus, the subject claims recite a system capable of selecting display modes for simultaneously displaying data on a variety of different types of (e.g. "disparate") displays. Potter *et al.* does not teach or suggest these limitations of the subject claims.

Potter *et al.* merely describes a system that directs graphical data to a display device 170. Contrary to the Examiner's assertion, the "bus controller 125...provided for controlling a bus 130" (Column 5, lines 66-67) does not teach or suggest the limitation of a control register able to *select or indicate a display mode*. Furthermore, according to Potter *et al.*, "The display device 170 preferably is a conventional horizontal scan cathode ray tube ("CRT") monitor having a plurality of pixels." (Column 6, lines 30-32.) Potter *et al.* discusses displaying data *across* two or more display devices. (See, e.g., Column 14, lines 28-34.) However, such display of data is merely a *single set of data* that is *formatted in a single predetermined manner* and divided for display on more than one display device. The referenced discussion of plural display devices does not teach or suggest a system capable of *formatting data* in a manner suitable for rendering on a *plurality of disparate device types*. Thus, Potter *et al.* fails to teach or suggest all of the claim limitations of the subject application as recited in independent claims 1, 21, 26, and 30.

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Aranda fails to make up for the aforementioned deficiencies of Potter *et al.* Aranda's discussion of a display interface states: "The display interface operates to generate the analog signals RGB on line 21 necessary to display the image on *a* display device (or CRT) 16 (along with the appropriate control signals). Although a CRT or monitor device is shown in the preferred embodiment, the techniques employed herein work equally well for *any two-dimensional display device* such as *a* plotter, printer, or other monitor type." (Column 5, lines 16-23, emphasis added.) It is readily apparent that Aranda merely discloses displaying data on a *single type* of display device at any single given time, as shown by the above-emphasized language. Aranda does not teach or suggest selecting display modes for simultaneously displaying data on a plurality of *disparate* devices.

In view of the above comments, it is readily apparent that neither Potter *et al.* nor Aranda, alone or in combination, teach or suggest the presently claimed invention as recited in independent claims 1, 21, 26, and 30 and claims 2-20, 22-25, 27-29, and 31-33, which depend respectively there from. This rejection should be withdrawn.

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CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

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